

Stephanie R. Tatar (237792)  
TATAR LAW FIRM, APC  
3500 W. Olive Avenue, Suite 300  
Burbank, CA 91505  
Telephone: (323) 744-1146  
Facsimile: (888) 778-5695  
Stephanie@TheTatarLawFirm.com

Erin A. Novak (admitted *pro hac vice*)  
FRANCIS & MAILMAN, P.C.  
Land Title Building, 19<sup>th</sup> Floor  
100 S. Broad Street  
Philadelphia, PA 19110  
Telephone: (215) 735-8600  
Facsimile: (215) 940-8000  
enovak@consumerlawfirm.com

Attorney for Plaintiff  
MICHAEL JOHNSON

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

MICHAEL JOHNSON,

Plaintiff,

vs.

ON-SITE MANAGER, INC.

Defendant.

**Case No.: 5:15-cv-04409-BLF**

**AFFIDAVIT OF ERIN A. NOVAK**

**Noticed Hearing Date and Time:  
August 24, 2017 at 9:00 a.m.**

**The Hon. Beth Labson Freeman**

Affidavit In Support Of Plaintiff Michael Johnson's Motion To Exclude The Expert Testimony  
Of Rebecca E. Kuehn  
C-15-04409 BLF

AFFIDAVIT OF ERIN A. NOVAK

I, ERIN A. NOVAK, declare as follows:

1. I am an attorney duly licensed to practice in the Commonwealth of Pennsylvania and the State of New Jersey.

2. I am lead counsel for Plaintiff Michael Johnson, admitted *pro hac vice*.

3. I have personal knowledge of the facts and circumstances of the above matter.

4. Attached hereto as Exhibit A is a true and correct copy of Defendant's Expert Report of Rebecca E. Kuehn.

5. Attached hereto as Exhibit B is a true and correct copy of a Defendant's Initial Disclosures.

6. Attached hereto as Exhibit C is a true and correct copy of a Defendant's Responses to Plaintiff's Requests for Production.

7. Attached hereto as Exhibit D is a true and correct copy of a Defendant's document production on July 18, 2017.

8. I certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/ Erin A. Novak  
ERIN A. NOVAK  
(*pro hac vice*)  
FRANCIS & MAILMAN, P.C.  
100 S. Broad Street, Ste. 1902  
Philadelphia, PA 19110  
Telephone: (215) 735-8600  
Facsimile: (215) 940-8000  
enovak@consumerlawfirm.com

Dated: July 20, 2017

Affidavit In Support Of Plaintiff Michael Johnson's Motion To Exclude The Expert Testimony  
Of Rebecca E. Kuehn  
C-15-04409 BLF